

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 1:14CR135
	:	
Miguel Arnulfo Valle Valle,	:	
	:	
Luis Alonso Valle Valle,	:	
	:	Judge Liam O’Grady
Defendants.	:	

DEFENDANTS’ MOTION FOR A BILL OF PARTICULARS

Come now the defendants, Miguel Valle Valle (“Miguel”) and Luis Valle Valle (“Luis”) (collectively “the Valles”), by and through undersigned counsel, pursuant to Federal Rules of Criminal Procedure, Rule 7(f) and the Fifth and Sixth Amendments to the United States Constitution, and hereby move this Court for an order compelling the government to file a bill of particulars, setting forth the following:

With respect to Counts One and Three of the Superseding Indictment:

1. Identify with as much particularity as possible the acts committed by the Valles that occurred in the Eastern District of Virginia.
2. Identify with as much particularity as possible the acts committed by co-conspirators that the Valles would know, or were reasonably foreseeable to the Valles, that the conspiracy would be completed in the Eastern District of Virginia.
3. Identify with as much particularity as possible the approximate dates, times, and locations of meetings or conversations in which the Valles were active participants that would impugn the knowledge to them that the cocaine sent out of the Honduras would enter and remain in the Eastern District of Virginia.

4. Identify with as much particularity as possible the names of co-defendants who participated in the District of Virginia distributions versus those who participated in distributions to other locations in the United States.

Wherefore, the defendants, Miguel Valle Valle and Luis Valle Valle, respectfully request that the Court grant their motion for the entry of an order compelling the government to file a bill of particulars as requested above and for such other relief as the Court deems proper.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2015, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF System.

/s/

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